

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO

IN RE: : Case No.: 18-60409
: :
JAMES MICHAEL MORSE : Chapter 7
: :
Debtor. : Judge Russ Kendig

APPLICATION FOR PAYMENT OF LEGAL FEES

Now comes, Rebecca K. Hockenberry, attorney for Debtor, and makes this application for payment of legal fees to be paid to her by the Trustee in the amount of \$2,025.00. See LBR 2016. The additional allowance is for legal services rendered for Debtor as follows:

a. Legal Services Performed and Date

Counsel prepared Chapter 13 bankruptcy petition, plan and related documents and represented client in Chapter 13 as set forth below.

b. Result obtained by the legal service

Debtor has converted his case to a Chapter 7 bankruptcy.

c. Actual Time spent (itemize in tenths of hours and attorney who performed legal service)

3/5/18	Draft bankruptcy petition, Chapter 13 plan, Confirmation Review Summary, etc.	5.0
3/6/18	Meet with client to review and sign bankruptcy documents. Revise petition. Draft e-mail to client re: filing.	1.1
3/7/18	Draft e-mail to client re: hearing date and providing a copy of plan and petition. Telephone call to creditor regarding bankruptcy filing. Draft e-mail to client re: same.	.3
3/27/18	E-mail communication with client re: contact with creditor.	.1
5/1/18	Draft letter to creditor regarding filing a proof of claim, addressing the vehicle loan, and requesting change in title.	.3
5/18/18	Spoke with creditor re: change in title and balance due on loan.	.3
5/29/18	Communications with Trustee's office regarding pay stubs. Met with client to review creditor issue. Telephone call to creditor's attorney to discuss resolution.	.1
6/5/18	Communication with Trustee's office and creditor's attorney regarding continuance of confirmation hearing. Communications with creditor's attorney proposing resolution on auto loan.	.5

6/6/18	Communications with Trustee's office re: continuance of confirmation hearing. Communications with creditor's attorney re: resolution of auto loan.	.3
6/20/18	Telephone call to creditor's attorney.	
7/25/18	Review proposed agreed order on GM objection. Communications with counsel for GM re: same and settlement on Ally dispute.	.4
8/21/18	Draft e-mail to attorneys for Ally re: resolution.	.1
8/23/18	E-mail communications with attorneys for Ally re: resolution.	.3
8/28/18	Draft e-mail to Ally's attorney following up on proposed resolution.	.1
9/7/18	Draft e-mail to Ally's attorney following up on proposed resolution. Draft e-mail to Trustee re: confirmation of plan.	.2
9/10/18	Communications with Ally's attorney re: resolution.	.125
9/18/18	Draft e-mail to Ally's attorney re: resolution.	.1
9/26/18	Draft follow-up e-mail to Ally's attorney re: resolution.	.1
10/29//18	Telephone call to Mr. Bailey. Spoke to client re: Ally.	.2
10/31/18	Communications with client re: auto loan and options. Travel to Canton to attend hearing.	3.5
	TOTAL	13.125

d. Counsel states that no previous application has been made for the services for which this application is made.

e. Proposed percentage payment to unsecured creditors

This case has been converted to Chapter 7.

f. Amount of fee requested

Counsel for Debtor is charging \$200.00 per hour for work performed in this matter. The total fee requested is \$2,625.00 of which \$600.00 has been paid.

WHEREFORE, the undersigned counsel respectfully requests payment of \$2,025.00 by the Trustee.

Respectfully Submitted,

/s/Rebecca K. Hockenberry

Rebecca K. Hockenberry (0074930)

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NOTICE OF APPLICATION FOR ADDITIONAL LEGAL FEES

Counsel for Debtor James Micheal Morse has filed papers with the court for Payment of Legal Fees.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you wish to consult one).

If you do not want the court to approve the additional attorney fees, or if you want the court to consider your views on the application, then on or before **December 28, 2018**, you or your attorney must File with the court a written request for a hearing, or, if the court requires a response, an answer, explaining your position at:

U.S Bankruptcy Court
Clerk's Office
Ralph Regula Federal Building and US Courthouse
401 McKinley Ave., SW
Canton, OH 44702

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also send a copy to:

Rebecca K. Hockenberry, Esq.
Thompson & Hockenberry Co., LPA
371 Lexington Avenue
Mansfield, OH 44907

Dynele L. Schinker-Kuharich, Chapter 13 Trustee
200 Market Avenue North, Suite LL30
Canton, OH 44702

Office of the U.S. Trustee
201 Superior Avenue East, Ste. 441
Cleveland, OH 44114

If you or your attorney do not take these steps, the court may decide that you do not oppose relief sought in the motion and may enter an order granting relief.

CERTIFICATE OF SERVICE

I certify that on December 6, 2018, a true and correct copy of the **APPLICATION FOR PAYMENT OF LEGAL FEES AND NOTICE** was served:

Via the court's Electronic Case Filing System on those entities and individuals who are listed on the court's Electronic Mail Notice List:

- Edward A. Bailey, on behalf of Ally Financial, at bknotice@reimerlaw.com
- Anthony J. DeGirolamo, Trustee - Mansfield ajdlaw@sbcglobal.net,
ad@trustesolutions.com; amber_weaver@sbcglobal.net; AD07@trustesolutions.net United States Trustee (Registered address)@usdoj.gov

And by regular U.S. mail, postage prepaid, on:

AmeriCredit Financial Services, Inc.
dba GM Financial
PO Box 183853
Arlington, TX 76096

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541

All creditors on the attached creditor matrix

/s/Rebecca K. Hockenberry

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